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Attorney for Plaintiff,
Thomas E. Smith

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

THOMAS E. SMITH,)	Case No.: C12-3533 LB (MEJ)
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER EXTENDING CASE SCHEDULE
vs.)	
)	
STEVEN HARRINGTON, PhD., Individually)	
and in his official capacity as Superintendent)	
of Schools, for Sonoma County Office of)	
Education; SHARON E. LIDDELL,)	
Individually and in her official capacity as)	
Superintendent of Santa Rosa City Schools;)	
GEORGE R. VALENZUELA, Individually)	
and in his official capacity as Compliance)	
Officer of Santa Rosa City Schools;)	
STEPHEN MAYER, Individually and in his)	
official capacity as Principal, Proctor Terrace)	
Elementary School, Santa Rosa City Schools;)	
DEBRA SANDERS, Ed.D, Individually and in)	
her official capacity as Director Special)	
Services, Santa Rosa City Schools; KIM)	
CRAVEN, M.S. and M.A., Individually and in)	
his official capacity as Special Services)	
Offices, Santa Rosa City Schools, School)	
Psychologist; SANTA ROSA CITY SCHOOL)	
DISTRICT, and DOES 1 through 100,)	
)	
Defendants.)	

Whereas discovery that was recently scheduled by both parties to occur in the month of April and May had to be postponed due to the unexpected death of Plaintiff's counsel's father, and his resultant unavailability as he traveled to the East Coast to attend funeral services, and whereas the discovery already scheduled will need to occur in the month of May and possibly

into early June, the parties hereto, by and through their respective counsel, hereby stipulate and request that the current case schedule be extended by 30 days.

The reason for the requested extension is that the parties have not yet completed the necessary party and witness depositions. The parties now expect to have those depositions completed by the end of May or mid-June. Plaintiff has noticed ten (10) depositions, the maximum number allowed without leave of court, and defense counsel plans to notice at least three (3) depositions. The undersigned attorneys are working diligently to get these depositions scheduled in a coordinated and timely manner. Additionally, written discovery served by Plaintiff has necessitated an extension of time to respond to, which was granted at the request of defense counsel, and said written discovery will need to be obtained by Plaintiff's counsel in preparation for the depositions currently scheduled.

Therefore, the parties respectfully request that the scheduling order for this case be extended by 30 days, as set forth in the proposed order below.

IT IS SO STIPULATED.

Dated: April 16, 2014

THOMAS A. MOORE

By: */s/ Thomas A. Moore
Attorney for Plaintiff
*Mr. Moore gave his consent to e-file this document

Dated: April 16, 2014

HAAPALA, THOMPSON & ABERN, LLP

By: /s/ Rebecca S. Widen
Rebecca S. Widen
Attorneys For Defendants

ORDER

The Court having considered the parties' stipulation, and good cause appearing, IT IS HEREBY ORDERED that the current case schedule be extended 30 days. The new case schedule shall be as follows:

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EVENT	DEADLINE
Fact deposition cutoff	June 20, 2014
Designation of Opening Experts	June 27, 2014
Designation of Rebuttal Experts	July 11, 2014
Expert Discovery Cutoff	July 25, 2014
Deadline(s) for Filing Discovery Motions	See Civil Local Rule 37-3
Last hearing date for dispositive motions and/or further case management conference	¹⁸ September 12 , 2014, at 9:30 a.m.
Meet and confer re pretrial filings	November 13, 2014 October 17, 2014
Pretrial filings	December 4, 2014 October 31, 2014
Oppositions, Objections, Exhibits and Deposition Designations due	December 18, 2014 November 7, 2014
Final Pretrial Conference	January 29, 2015 at 1:30 p.m. November 13, 2014, at 11:00 a.m.
Trial	February 17, 2015 at 8:30 a.m. December 15, 2014, at 8:30 a.m.

Dated: April 21, 2014

U.S. Magistrate Judge Laurel Beeler